# UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS, BOSTON DIVISION

MARK SAUNDERS	) )
Plaintiff,	) )
v.	)
EMPIRE TODAY, LLC, GEOFFREY NUNEMAN and JLB CONCEPTS, INC. (F/K/A CHA COBRASOURCE, INCORPORATED),	) CIVIL ACTION NO. 10-CV-11484-GAO ) )
Defendants.	) ) )

# STIPULATION OF DISMISSAL OF ALL CLAIMS AND CROSS-CLAIMS PURSUANT TO FED. RULE CIV. P. 41(a)(1)(A)(ii) AND 41(c)

The undersigned parties hereby stipulate pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) that all claims asserted by the plaintiff, Mark Saunders ("Saunders"), against the Defendants, Empire Today, LLC ("Empire"), Geoffrey Nuneman and JLB Concepts, Inc. f/k/a CHA COBRASOURCE, Incorporated ("COBRASource") shall be dismissed with prejudice and without costs, each party to bear its own attorney's fees.

The parties further stipulate pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) and 41(c) that all cross-claims asserted between Empire and COBRAsource shall be dismissed with prejudice and without costs, each party to bear its own attorney's fees.

Respectfully submitted,

#### MARK SAUNDERS

By its Attorney,

## /s/ Elizabeth K. Levine\_

Elizabeth K. Levine, BBO #658532 **GOULSTON & STORRS** 400 Atlantic Avenue Boston, MA 02110-3333 (617) 574-6549

## **EMPIRE TODAY, LLC and GEOFFREY NUNEMAN**

By their Attorneys,

## /s/ Matthew J. Caccamo\_

Matthew J. Caccamo, Ill. BBO# 6282605 (admitted *pro hac vice*) BAKER & HOSTETLER, LLP 191 North Wacker Drive, Suite 3100 Chicago, IL 60606

JLB Concepts, Inc. f/k/a CHC COBRAsource, Inc.

By its Attorneys,

### /s/ Richard J. Riley

Richard J. Riley, BBO# 420610 Melissa S. Arnold, BBO# 655292 MURPHY & RILEY, P.C. 101 Summer Street, 2<sup>nd</sup> Floor Boston, MA 02110 (617) 423-3700

Dated: November 4, 2014

## **CERTIFICATE OF SERVICE**

I, Elizabeth K. Levine, do hereby certify that a true and correct copy of the foregoing document was served upon all counsel of record via the CM/ECF system of the United States District Court for the District of Massachusetts on this 4th day of November, 2014.

/s/ Elizabeth K. Levine
Elizabeth K. Levine